

Gwen Casey

Who is commenting? *(choose the best fit)*

Member of the general public

Do you have any recommended changes or other considerations that you think the MPCA should take into account when defining the term "essential for health, safety, or the functioning of society"? *(Please review the proposed definitions in the rule concept document prior to answering)*

In determining that a withholding PFAS from a product would result in loss of a products services that would create "A significant increase in negative health outcomes; or an inability to mitigate significant risks to human health or the environment," I believe that these negative health and environmental outcomes must be compared the known negative health and environmental outcomes of continuing to use PFAS in the specific product. For example, if a firefighting foam manufacturer claimed that stopping use of PFAS in their product would result in negative health outcomes (fire risk), I think that those outcomes should be weighed against the health and environmental risks (cancer, endocrine disruption, environmental contamination) of their continued use - especially in cases where PFAS alternatives exist.

Do you have any recommended changes or other considerations that you think the MPCA should take into account when defining the term "alternative"? *(Please review the proposed definitions in the rule concept document prior to answering)*

Any PFAS alternative must be thoroughly tested to prove it has significantly lower environmental and health risks than PFAS. We have seen many cases of regrettable substitutions in the past - the replacement of lead pipes with PVC or the switch from CFCs to HFCs in refrigerants - and should avoid this at all costs in the phasing out of PFAS.

What are the potential ongoing costs to society if the commissioner issues a positive currently unavoidable use determination for the continued use of PFAS within a product or product category? *(For example: environmental, human health, or remediation costs)*

PFAS are causing irreparable damage to human health and the environment.

 Here are 2 ways in which PFAS have already caused direct harm that will worsen with their continued use:

 1. Contamination of Biosolids - Biosolids from wastewater treatment used to be a healthy and viable addition to agricultural and recreational land to rebuild soil and provide a sustainable alternative to landfilling organic material. However, the rising quantities of PFAS in wastewater and subsequent biosolids have resulted in the permanent contamination of many agricultural lands and the rollback of biosolids recovery programs. Instead, this valuable organic material must be put in a landfill where it is separated from natural carbon cycles and contributes to climate change.

 2. Contamination of Minnesota Lakes - In Robbinsdale, MN, both Crystal and Twin Lakes

were recently determined to be contaminated with PFAS. Due to this contamination, residents were warned to not eat more than 1 serving of fish from these lakes per month or avoid all together if they are in a sensitive group. PFAS contamination is permanent, and this designation has been a significant setback in ongoing work to improve water quality in these lakes. It widens disconnect between people and their environment and instills a rightful fear in fishing and eating from these lakes.

For manufacturers: Administrative cost of requesting a CUU determination (Part 1 of 2). *Please provide your best estimates or rough orders of magnitude (for example "approx. 200 hours"). Precise accounting data is not necessary to answer this question.*

If your company currently possesses information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours that were required to establish this baseline.

Not applicable

For manufacturers: Administrative cost of requesting a CUU determination (Part 2 of 2). *Please provide your best estimates or rough orders of magnitude (for example "approx. 200 hours"). Precise accounting data is not necessary to answer this question.*

If your company does not possess information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours needed to obtain this data from your Tier 2 or 3 suppliers for a single product line.

Not applicable